

REMARKS

A. Background

Claims 1-12 were pending in the application at the time of the Office Action. Claims 1-12 were rejected as being non-statutory subject matter under 35 U.S.C. 101. Claims 1-12 were also rejected as being anticipated over the prior art. By this response, Applicant has cancelled claims 1-12 and added new claims 13-38. As such, claims 13-38 are presented for the Examiner's consideration in light of the following remarks.

B. Proposed Amendments

By this amendment, claims 1-12 have been cancelled without prejudice or disclaimer and claims 13-38 have been added. Applicant asserts that the addition of new claims 13-38 are based on the specification as originally filed and that no new matter has been added. As such, Applicant requests that the addition of new claims 13-38 be entered.

C. Rejection on the Merits

Non-statutory Subject Matter under 35 U.S.C. 101

Claims 1-12 were rejected under 35 U.S.C. 101 as being non-statutory subject matter. By this response, claims 1-12 were cancelled and, as such, Applicant respectfully submits that the rejection is now moot.

In addition, Applicant asserts that new claims 13-38 present statutory subject matter under 35 U.S.C. 101. That is, new independent claim 13 is directed to a system claim. A system claim clearly falls under the purview of statutory subject matter.

New independent claim 20 is directed to a method that provides a "useful, concrete, and tangible result." *See State Street Bank & Trust Co. v. Signature Fin. Group, Inc.*, 149 F.3d 1368, 1383-75, 47 USPQ2d 1596, 1600-02 (Fed. Cir. 1998) (a claimed data processing system for implementing a financial management structure satisfied the § 101 inquiry because it constituted a "practical application of a mathematical algorithm, . . . [by] produc[ing] `a useful, concrete and tangible result.'"). That is, the invention recited in claim 20 allows for traversing the hierarchy of one or more data containers in a first data structure description to determine a unique key for each leaf data element of the first data structure description, which unique key can, in a novel way, be used to automate transfer of data from a first in-memory data component to a second in-memory data component— a useful, concrete and tangible result.

New independent claim 31 is directed to a computer program product. "Without question, software code alone qualifies as an invention eligible for patenting under these categories, at least as processes." *Eolas Technologies Inc. v. Microsoft Corp.*, 399 F.3d 1385, 1339 (Fed. Cir. 2005) (citations omitted). As such, the subject matter of claim 31 is patentable subject matter since it encompasses a software product.

Finally, new independent claim 38 is directed to a method for traversing one or more leaf data elements in a first data structure description to determine a unique key for each leaf data element, which unique key can, in a novel way, be used to automate transfer of data from a first in-memory data component to a second in-memory data component— a useful, concrete and tangible result.

Applicant respectfully submits that new claims 13-38 thus present patentable subject matter.

Anticipation under 35 U.S.C. 102

Claims 1-12 were rejected under 35 U.S.C. 102(b) as being anticipated by Applicant's disclosure in the Background and Related Art section of the patent application (specification pages 1-4). By this response, claims 1-12 were cancelled and, as such, Applicant respectfully submits that the rejection is now moot.

In addition, Applicant asserts that new claims 13-38 are not anticipated by disclosure in the Background and Related Art section of the patent application (specification pages 1-4). Each new independent claim presents limitations that are not disclosed in the Background and Related Art section of the patent application. For example, independent claim 13 recites "a high-performance run-time engine configured to: dynamically generate a first in-memory data component containing actual data associated with the leaf data elements of the first data structure description using a key-based look-up molding technique, the first in-memory data component comprising at least one lookup table; traverse the one or more mapping descriptions and accessing the at least one lookup table of the first in-memory data component to get actual data stored in the first in-memory data component using a key-based look-up technique; dynamically generate a second in-memory data component configured to store actual data associated with the leaf data elements of the second data structure description using the key-based look-up molding technique, the second in-memory data component comprising at least one lookup table; and transfer data between the first in-memory data component and the second in-memory data component according to the one or more mapping descriptions" which limitations are not described in the Background and Related Art section of the patent application.

Independent claim 20 recites "traversing the hierarchy of one or more data containers in the first data structure description to determine a unique key for each leaf data element of the

first data structure description, comprising at least one of: determining whether all of the one or more data containers in the first data structure description are singular data containers, wherein, for each leaf data element, a key is generated containing a concatenation of all names of the data containers in a hierarchical path to the leaf data element, each data container name separated by a character that is not allowed as part of the data container name, concatenated with a name of the leaf data element, and storing the key in a lookup table of a single in-memory data component; or determining whether one or more data containers in the first data structure description is a plural data container, wherein upon identifying a plural data container, a component list is instantiated in a lookup table having a key that is generated containing a concatenation of names of all the data containers traversed either from a root node or from a previous plural data container to a hierarchical path to the identified plural data container, the component list comprising a plurality of data components," which limitations are not described in the Background and Related Art section of the patent application.

Independent claim 31 recites "map a relation and association between leaf data elements of a first data structure description and leaf data elements of a second data structure description; set data values of any leaf data element of the first data structure description in a first in-memory data component using a key generated from a key-based look-up molding technique; get the data values of any leaf data element of the first data structure from the first in-memory data component using the key generated from the key-based look-up molding technique; and automate transfer of the data values from the first in-memory data component to a second in-memory data component," which limitations are not described in the Background and Related Art section of the patent application.

Finally, independent claim 38 recites "traversing the one or more leaf data elements in the first data structure description to determine a unique key for each leaf data element, wherein, for each singular or plural leaf data element, a key is generated comprising at least part of a hierarchical path to the singular or plural leaf data element, and storing the key in a lookup table of an in-memory data component," which limitations are not described in the Background and Related Art section of the patent application.

As such, Applicant respectfully submits that new claims 13-38 are not anticipated by disclosure in the Background and Related Art section of the patent application.

D. Conclusion

Applicant notes that this response does not discuss every reason why the presented claims are distinguished over the cited prior art. Most notably, applicant submits that many if not all of the dependent claims are independently distinguishable over the cited prior art. Applicant has merely submitted those arguments which it considers sufficient to clearly distinguish the claims over the cited prior art.

In view of the foregoing, applicant respectfully requests the Examiner's consideration and allowance of new claims 13-38 as presented herein.

In the event there remains any impediment to allowance of the claims which could be clarified in a telephonic interview, the Examiner is respectfully requested to initiate such an interview with the undersigned.

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Respectfully submitted,

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